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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Marianna Udem Brigitte McGrath ASK LLP 60 East 42 nd Street, 46 th Floor New York, NY 10165 Telephone: (212) 267-7342 Facsimile: (212) 918-3427 mudem@askllp.com bmcgrath@askllp.com <i>Special Counsel to the Plan Administrator</i> | |
| In re: BED BATH & BEYOND, INC., <i>et al.</i> , ¹ <div style="text-align: center;">Debtor.</div> | Chapter 11 Case No. 23-13359 (VFP) (Jointly Administered) |
| Michael Goldberg, as Plan Administrator for 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.), ² <div style="text-align: right;">Plaintiff,</div> v. Artsana USA, Inc., <div style="text-align: right;">Defendant.</div> | Adv. No. 24-01336 |

**STIPULATION TO EXTEND
CERTAIN DEADLINES IN PROCEDURES ORDER**

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

² Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as "Bed Bath & Beyond Inc." was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

Michael Goldberg, in his capacity as Plan Administrator (the “Plaintiff” or “Plan Administrator”) for 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.) and its affiliated debtors (each, a “Debtor” and collectively, the “Wind-Down Debtors” or “Debtors”), and Artsana USA, Inc. (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Certain Deadlines in the Procedures Order* (the “Stipulation”) and hereby stipulate and agree as follows:

WHEREAS, on August 9, 2024, the Court entered the *Order Granting Motion for Order Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant to Sections 502, 542, 547, 548, 549, and 550 of the Bankruptcy Code* (the “Procedures Order”) [Docket No. 3445], which Procedures Order applies to the above-captioned adversary proceeding;

WHEREAS, the Parties conducted a mediation in November 2024 in compliance with the Procedures Order, which mediation carried over to February 2025, and the result of which was an impasse;

WHEREAS, Defendant has not filed an Answer, and Plaintiff intends to file an Amended Complaint;

WHEREAS, the Parties desire to extend the deadlines in the Scheduling Order to accommodate the filing of the Amended Complaint and the Defendant’s Answer.

WHEREFORE, the Parties agree and stipulate as follows:

1. Plaintiff shall have until February 18, 2025 in which to file an Amended Complaint, and undersigned counsel for Defendant agrees to accept service of the summons and complaint on behalf of Defendant;

2. Defendant shall have until March 16, 2025 in which to file an Answer or responsive pleading;
3. The Parties shall have until April 15, 2025 in which to provide the disclosures required under Bankruptcy Rule 7026(a)(1) (the “Initial Disclosures”) and in which to serve all written interrogatories, document requests, and requests for admission;
4. The Parties shall have until July 15, 2025 in which to complete non-expert discovery, including depositions of fact witnesses;
5. Any disclosures and reports of the Parties’ case-in-chief experts, or experts and reports concerning an issue to which the party bears the burden of proof, shall be made to the adverse party on or before September 15, 2025;
6. Any disclosures and reports of the Parties’ rebuttal experts shall be made to the adverse party on or before October 15, 2025;
7. All expert discovery, including expert witness depositions, shall be concluded on or before November 15, 2025; and
8. All dispositive motions shall be filed and served by December 15, 2025. Local Rule 7056-1 shall apply.
9. Except as expressly modified herein, the Procedures Order shall remain in effect in this adversary proceeding.

Dated: February 17, 2025

ASK LLP

/s/ Brigitte McGrath
Brigitte McGrath, Esq.
NJ SBN 01000-2011
Joseph L. Steinfeld, Jr., Esq.
MN 0266292
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3857
Email: bmcgrath@askllp.com

-and-

Marianna Udem, Esq., NJ SBN 03659-2006
60 East 42nd Street, 46th Fl.
New York, NY 10165
Telephone: (212) 267-7342
Email: mudem@askllp.com

Counsel for Plaintiff

Dated: February 17, 2025

SAUL EWING LLP

/s/ John D. Demmy
John D. Demmy, Esq.
DE SBN 2802
1201 North Market St., Ste. 2300
Wilmington, DE 19801
Telephone: (302) 421-6848
Email: john.demmy@saul.com

Counsel to Defendant